

Defense of Cost Recovery Action - 00302

Description	October	November	December	Total
Photocopies	\$ 273.80	\$ 36.15	\$ 386.65	\$ 696.60
Facsimilies	\$ 16.00	\$ 11.00	\$ 5.00	\$ 32.00
Long Distance Telephone	\$ 26.24	\$ 2.00	\$ 0.73	\$ 28.97
Outside Courier	\$ 121.23	\$ -	\$ -	\$ 121.23
Travel Expenses	\$ 1,297.00	\$ 271.35	\$ 141.97	\$ 1,710.32
Lexis	\$ 875.75	\$ 663.53	\$ 792.05	\$ 2,331.33
Westlaw	\$ -	\$ -	\$ -	\$ -
Meal Expenses	\$ -	\$ 43.46	\$ -	\$ 43.46
Overtime	\$ -	\$ -	\$ -	\$ -
Other Expenses	\$ -	\$ -	\$ -	\$ -
Secretarial Support	\$ 61.25	\$ -	\$ -	\$ 61.25
TOTAL	\$ 2,671.27	\$ 1,027.49	\$ 1,326.40	\$ 5,025.16

November 20, 2001

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 Invoice No.: 579873
 Client No.: 04339
 Matter No.: 00302

Regarding: Libby - Cost Recovery Case**Itemized Services**

Date	Tkpr	Description	Hours	Value
10/01/01	KWL	Review and revise strategy memo (3.0); begin draft interrogatories (2.0).	5.00	\$ 1,500.00
10/01/01	JDM	Conference with KWLund re administrative record and meeting with EPA; conference with KJCoggon re supplemental brief; review draft case strategy letter; draft comments to strategy letter.	2.50	625.00
10/01/01	KJC	Draft supplemental brief in opposition to EPA motion to limit review and discovery to administrative record including conferences with JDMcCarthy (2.0).	2.00	480.00
10/02/01	KWL	Telephone conference with Bill Corcoran re Administrative Record review (.30); meet with CLNeitzel re procedure for record review (.50); review and revise draft strategy memorandum to Bob Emmett (3.0).	3.80	1,140.00
10/02/01	JDM	Revise supplemental brief (.50); review and revise second draft of case strategy letter (.50); telephone conference with EESTevenson re strategy letter (.30).	1.30	325.00
10/02/01	KJC	Revise and send supplemental brief in response to EPA motion to limit review and discovery to administrative record including conference with JDMcCarthy (0.5).	0.50	120.00
10/03/01	KWL	Complete strategy memorandum (2.50); begin review of Supplemental Administrative Record (3.40); telephone conference with Dale Jensen re expert witness strategy (.30).	6.20	1,860.00
10/03/01	GMB	Conference with KWLund (.60); Lexis research on CERCLA and asbestos (.70); review cases from Lexis (1.20); draft notes relating to which buildings are facilities (.10); review cases from Lexis (.70).	3.70	777.00

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Date	Tkpr	Description	Hours	Value
10/04/01	KWL	Review Peronard deposition transcript (1.0); telephone conference with Bob Emmett re strategy and memo (.50); telephone conference with Jim Freeman, Matt Cohn and Bob Emmett re case management issues (.50).	2.00	600.00
10/04/01	GMB	Research whether EPA can recover costs (.50); Lexis research on investigation costs(.30); research EPA records (.30); Lexis research based on EPA records (.30); revise cases from Lexis (.30); Additional Lexis research re investigation of costs (.50); research CERLA and residential reports (.50); revise Lexis cases on closts if no remediation /removal (.70); framing response to KWLund's questions(.60); reviewing Lexis research (.60).	4.60	966.00
10/05/01	KWL	Meet with Geoff Barry re consumer product research (.50); review Grace affirmative defenses re stipulations for dismissal (1.20).	1.70	510.00
10/05/01	GMB	Lexis search, review case and cite search (.70); conference with KWLund (.20).	0.90	189.00
10/08/01	KWL	Work on litigation strategy memo (2.50); review and revise interrogatories and request for production (1.50).	4.00	1,200.00
10/08/01	JDM	Review order and stipulations (.50); conference with KWLund re stipulations and case management order (.30).	0.80	200.00
10/08/01	GMB	Conference with KWLund (.20); review Access documents (.20); continue review of Access documents (.50); access Del Bankruptcy Court docket (.10); prepare memo re insulation (.50); review pleadings (1.40).	2.90	609.00
10/09/01	KWL	Telephone conference with Bob Emmett re revisions to cost recovery case (.70); telephone conference with Bill Corcoran re strategy memo issues (.20); work on revised strategy memo (6.50).	7.40	2,220.00

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Date	Tkpr	Description	Hours	Value
10/09/01	GMB	Continue review of Access pleadings (1.00); research WR Grace bankruptcy filings for corporate structure/successors (2.70); draft and edit memo for KWLund (3.30); Lexis research (.40); review documents from KJCoggon, reference material re corporate successors (1.00).	8.40	1,764.00
10/10/01	KWL	Work on revised strategy memo (3.70); telephone conference with Bob Emmett re same (.30); telephone conference with Jim Freeman re reply brief extension (.30)	4.30	1,290.00
10/10/01	JDM	Review Sept. 6 Order (0.4); research factual assertions in Order (1.4); telephone conference with G. Graham re comments to Sept. 6 Order and DOJ proposed revisions (0.8); review agreement and plan of reorganization between Grace and Zonolite (1963) (0.5); meet with KWLund re authorization/foundation issue (0.4); telephone conference with G. Graham re authority/foundation stipulation (0.5); draft proposed revisions to pretrial order (1.0); draft letter to J. Freeman re proposed changes to pretrial order (0.5); telephone conference with J. Freeman re proposed changes to pretrial order (0.5); draft proposed revisions to paragraph 4 of order (0.2).	6.20	1,550.00
10/10/01	GMB	Research corporate ownership issues (.90).	0.90	189.00
10/11/01	KWL	Complete strategy memo (3.0); complete draft interrogatories and request for production (2.0); telephone conference with Bob Emmett re final comments to strategy memo (.30).	5.30	1,590.00
10/11/01	JDM	Conference with KWLund re negotiations with DOJ re Sept. 6 order modifications.	0.20	50.00
10/11/01	GMB	Continue Lexis research re corporate ownership (.10); continue review of documents re corporate ownership (.80).	0.90	189.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
10/12/01	KWL	Telephone conference with Dori Kuchinsky re ATSDR data and information (.40); review ATSDR report and backup information (2.0); telephone conference with Bert Price re additional information requested (.50).	2.90	870.00
10/12/01	GMB	Draft memo for KWLund re corporate successor to Zonolite (1.40); revise memo re same (.50).	1.90	399.00
10/14/01	KWL	Travel to Baltimore while preparing for Libby strategy meeting (3.0).	3.00	900.00
10/15/01	KWL	Prepare for and attend Libby strategy meeting with Bill Corcoran and Bob Emmett (7.0); return travel to Denver while reviewing EPA Workplan and administrative record documents (3.0)	10.00	3,000.00
10/16/01	KWL	Telephone conference with Bob Emmett and Bill Corcoran re strategy followup (.30); telephone conference with Jim Freeman re Motion's to Strike (.40); confer with JDMcCarthy re Grace strategy issues (.30).	1.00	300.00
10/18/01	KWL	Review supplemental administrative records documents (3.30); telephone conferences with Bill Corcoran re same (.70).	4.00	1,200.00
10/18/01	TWK	Revise interrogatories and requests for production to EPA (2.30); meet with KWLund re same (.10); research deadlines and deliverables (.30); research federal and local discovery rules (.30).	3.00	330.00
10/18/01	ICM	Review and edit interrogatories as per EESTevenson's request.	1.30	117.00
10/19/01	NKA	Search for and locate documents in administrative record per CLNeitzel's request.	5.50	550.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
10/19/01	TWK	Revise interrogatories and requests for production to EPA (2.50); meet with E. Stevenson re same (.50); research recent EPA cost actions (.30).	3.30	363.00
10/19/01	ICM	Search for and locate documents in administrative record as per CLNeitzel's request (2.0); set up several attorneys and paralegals for multiple access to data (1.0); search for target sheets to obtain information not supplied by EPA (2.40).	5.40	486.00
10/20/01	ICM	Follow up with CLNeitzel and word processing on status of supplemental administrative record documents.	0.50	45.00
10/22/01	KWL	Review legal issues and Grace defenses (1.60); revise Interrogatories and Request for Production (1.30).	2.90	870.00
10/22/01	NKA	Search for and locate documents in administrative record per CLNeitzel's request.	7.00	700.00
10/23/01	JDM	Conference with CLNeitzel re administrative record.	0.30	75.00
10/23/01	NKA	Search for and locate documents in administrative record per CLNeitzel's request.	3.00	300.00
10/25/01	KWL	Review and revise Request for Production to EPA (1.0).	1.00	300.00
10/29/01	KWL	Final revisions to Interrogatories and Request for Production (1.0); telephone conference with Gary Graham re same (.20); telephone conference with Jim Freeman re same (.20).	1.40	420.00
10/29/01	JDM	Telephone conference with Jim Freeman re amendment of Scheduling Order (.40); telephone conference with Jim Freeman re stipulations (.40).	0.80	200.00
10/29/01	TWK	Revise discovery requests to EPA (1.50); prepare final version of same (.60).	2.10	231.00
10/30/01	KWL	Review Peronard deposition transcript (1.50).	1.50	450.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
10/30/01	JDM	Revised proposed stipulations (1.0); telephone conference with G. Graham re proposed stipulations (.50); telephone conference with Jay Hughes re Grace history (.50); revise amended order (1.0).	3.00	750.00
10/31/01	JDM	Draft letter to J. Freeman and proposed modifications of Court's September 6 order (.70); conference with KWLund re case strategy (.30).	1.00	250.00

Total Fees Through October 31, 2001: 141.30 \$ 33,049.00

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W. Lund	Partner	\$ 300.00	67.40	\$ 20,220.00
JDM	Jay D. McCarthy	Partner	250.00	16.10	4,025.00
KJC	Katheryn J. Coggon	Senior Associate	240.00	2.50	600.00
GMB	Geoffrey M. Barry	Associate	210.00	24.20	5,082.00
TWK	Thomas W. Korver	Paralegal	110.00	8.40	924.00
NKA	Natalie K. Aberle	Paralegal	100.00	15.50	1,550.00
ICM	Imelda Mulholland	Information Specialist	90.00	7.20	648.00

Total Fees: 141.30 \$ 33,049.00

Itemized Disbursements

Date	Qty	Description	Amount
09/27/01		Lexis	\$ 81.59
09/27/01		Lexis	20.14
09/27/01		Lexis	40.29

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Itemized Disbursements

Date	Qty	Description	Amount
10/02/01		Long Distance Telephone: 4105314203	4.93
10/02/01	22	Photocopies	4.40
10/03/01		Lexis	113.33
10/03/01		Travel Expense: VENDOR: Majest International; INVOICE#: 14825; DATE: 10/3/2001 - Airfare: 10/14/2001-Denver Baltimore, KLund.	942.25
10/03/01		Travel Expense: VENDOR: Majest International; INVOICE#: 14827; DATE: 10/3/2001 - Airfare: 10/15. Baltimore Denver/ KLund	354.75
10/04/01		Lexis	425.66
10/04/01		Long Distance Telephone: 4105314751	1.76
10/04/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-978-66180; DATE: 10/4/01 - Courier, Acct. 0802-0410-8 09-26; Gary L Graham Missoula, Mt	15.14
10/04/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-978-66180; DATE: 10/4/01 - Courier, Acct. 0802-0410-8 09-21; Gary L Graham Missoula, Mt	22.44
10/05/01		Lexis	13.82
10/09/01		Lexis	180.92
10/09/01		Long Distance Telephone: 4105314751	6.48
10/10/01	3	Facsimile	3.00
10/10/01		Long Distance Telephone: 4065232500	0.15
10/10/01		Long Distance Telephone: 4065232500	2.42
10/10/01	74	Photocopies	14.80
10/10/01	1	Photocopies	0.20
10/10/01	50	Photocopies	10.00
10/10/01	25	Photocopies	5.00
10/11/01		Long Distance Telephone: 4105314751	1.70
10/12/01		Long Distance Telephone: 4105314751	2.21

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Date	Qty	Description	Amount
10/12/01	152	Photocopies	30.40
10/12/01	1	Velo Binding: 1 Velo Binding	1.00
10/16/01	599	Photocopies	119.80
10/17/01		Long Distance Telephone: 4105314751	1.03
10/17/01	165	Photocopies	33.00
10/17/01	76	Photocopies	15.20
10/18/01		Long Distance Telephone: 7037298543	1.08
10/18/01		Long Distance Telephone: 7037298543	1.74
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-12; Dori Anne Kicjinsky Leesburg, Va	9.76
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-12; Richard Finke Boca Raton, Fl	9.76
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-11; William Corcoran Columbia, Md	14.87
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-11; Robert Emmett Columbia, Md	14.87
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-11; David Siegel Columbia, Md	14.87
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-12; William Corcoran Columbia, Md	9.76
10/18/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 5-979-31666; DATE: 10/18/01 - Courier, Acct. 0802-0410-8 10-12; Robert Emmett Columbia, Md	9.76
10/29/01	13	Facsimile	13.00

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Itemized Disbursements

Date	Qty	Description	Amount
10/29/01	13	Photocopies	2.60
10/30/01		Long Distance Telephone: 4065232500	1.80
10/30/01		Long Distance Telephone: 5613621532	0.94
10/30/01	192	Photocopies	38.40
10/31/01		Secretarial Support: Secretarial overtime 10/15/2001 KW	61.25
Total Disbursements:			\$ 2,672.27

Disbursement Summary

Secretarial Support	\$ 61.25
Photocopies	273.80
Facsimile	16.00
Long Distance Telephone	26.24
Outside Courier	121.23
Travel Expense	1,297.00
Lexis	875.75
Velo Binding	1.00
Total Disbursements:	\$ 2,672.27

Accounts Receivable Detail

Invoice	Date	Description	Amount
577764	10/30/01	Bill	5,425.00
<i>Outstanding Balance on Invoice 577764:</i>			\$ 5,425.00

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 Invoice No.: 583055
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Regarding: Libby - Cost Recovery Case**Itemized Services**

Date	Tkpr	Description	Hours	Value
10/19/01	KWL	Review and administrative record documents (1.60); telephone conference with Matt Cohn re same (.20).	1.80	\$ 585.00
11/01/01	JDM	Revise scheduling order (.30); letter to J. Freeman (.20).	0.50	125.00
11/01/01	GMB	Conference with KJCoggon re document review.	0.30	63.00
11/05/01	GMB	Read document review handbook.	1.30	273.00
11/06/01	GMB	Reading re document review handbook material.	4.30	903.00
11/09/01	JDM	Telephone conference with J. Freeman re affirmative defenses (.20); conference with KWLund re same (.20); telephone conference with J. Freeman re research of affirmative defenses issues (.40).	0.80	200.00
11/11/01	KJC	Research regarding opposition to motion to strike affirmative defenses (1.0).	1.00	240.00
11/12/01	KJC	Research regarding opposition to motion to strike affirmative defenses (1.5).	1.50	360.00
11/13/01	JDM	Telephone conference with J. Freeman re affirmative defenses (.20); conference with KJCoggon re stipulation and letter to J. Freeman (.10); revise letter and stipulation (.80); exchange e-mails with J. Baer re questions from creditors committee (.20).	1.30	325.00
11/13/01	KJC	Telephone conference with JDMcCarthy re stipulation to withdraw certain affirm defenses (.50); draft stipulation and letter to Jim Freeman re same (1.9).	2.40	576.00
11/15/01	JDM	Obtain information requested by creditors committee (.20); draft letter to J. Baer re creditors questions (.30).	0.50	125.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/15/01	KJC	Assign research re impermissible retroactive application defense (0.3).	0.30	72.00
11/16/01	JDM	Telephone conference with J. Freeman re stipulation (.30); revise stipulation; draft transmittal (.50).	0.80	200.00
11/16/01	KJC	Conference with NAberle regarding research on constitutionality of applying CERCLA retroactively (0.3).	0.30	72.00
11/16/01	GMB	Conference with CLNeitzel re Administration Record Review.	0.30	63.00
11/16/01	NKA	Research for KJCoggan regarding "retroactive application of CERCLA" and GE case.	5.40	540.00
11/19/01	KWL	Work on cost recovery issues re deposition strategy and expert witnesses.	3.10	1,007.50
11/19/01	JDM	Telephone conference with J. Freeman re affirmative defenses stipulation (.30); revise stipulation re defenses (.50); telephone conference with J. Freeman re amending scheduling order (.10); draft motion to amend scheduling order (1.0).	1.80	450.00
11/19/01	KJC	Review research re constitutional challenges to CERCLA.	0.50	120.00
11/19/01	MRG	Review correspondence re preliminary statements; review statements.	0.50	90.00
11/19/01	TWK	Meet with JDMcCarthy re EPA request for extension on discovery deadline and EPA questions re discovery production (.10); research EPA administrative record and production volumes (.20).	0.30	33.00
11/20/01	KWL	Work on cost recovery issues re strategy for administrative record comments.	2.00	650.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/20/01	JDM	Revise draft motion to amend order (.30); review U.S. proposed protective order (.20); draft comments to proposed protective order (.30).	0.80	200.00
11/21/01	KWL	Work on cost recovery issues re strategy for administrative record comments.	2.00	650.00
11/21/01	JDM	Conference with MRGordon re response to J. Freeman letter.	0.30	75.00
11/26/01	KWL	Telephone conference with Jim Freeman re discovery issues (.30); review Dale Jensen strategy e-mail (.50).	0.80	260.00
11/26/01	JDM	Telephone conference with G. Graham re Motion to Amend Preliminary Pretrial Order (.50); review motion and transmit to DOJ (.30).	0.80	200.00
11/27/01	KWL	Develop strategy outline for Peronard deposition (3.0).	3.00	975.00
11/27/01	MRG	Work on letter to Freeman re preliminary statement.	0.80	144.00
11/28/01	MRG	Finish draft letter to Freeman re preliminary statement.	0.30	54.00
11/30/01	KWL	Telephone conference with Bob Emmett re case update and strategy (.50); telephone conference with Bill Corcoran re same (.50).	0.50	162.50

Total Fees Through November 30, 2001: 40.30 \$ 9,793.00

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W. Lund	Partner	\$ 325.00	13.20	\$ 4,290.00
JDM	Jay D. McCarthy	Partner	250.00	7.60	1,900.00
KJC	Katheryn J. Coggon	Senior Associate	240.00	6.00	1,440.00
GMB	Geoffrey M. Barry	Associate	210.00	6.20	1,302.00
MRG	Mark R. Gordon	Associate	180.00	1.60	288.00

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Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
TWK	Thomas W. Korver	Paralegal	110.00	0.30	33.00
NKA	Natalie K. Aberle	Paralegal	100.00	5.40	540.00
Total Fees:				40.30	\$ 9,793.00

Itemized Disbursements

Date	Qty	Description	Amount
11/01/01	5	Facsimile	\$ 5.00
11/01/01	10	Photocopies	1.50
11/05/01	78	Photocopies	11.70
11/07/01		Long Distance Telephone: 3128612162	1.49
11/07/01	19	Photocopies	2.85
11/08/01		Long Distance Telephone: 2028795160	0.11
11/08/01		Long Distance Telephone: 3128612162	0.03
11/08/01		Other Meal Expenses: VENDOR: Kenneth W. Lund; INVOICE#: ER110601; DATE: 11/8/2001 - TE: 10/14-15/01 Baltimore, client Meet with WR Grace re: Libby strategy meeting	43.46
11/08/01		Travel Expense: VENDOR: Kenneth W. Lund; INVOICE#: ER110601; DATE: 11/8/2001 - TE: 10/14-15/01 Baltimore, client Meet with WR Grace re: Libby strategy meeting	271.35
11/13/01	6	Facsimile	6.00
11/13/01		Long Distance Telephone: 4065232500	0.11
11/13/01		Long Distance Telephone: 4065232500	0.11
11/13/01	32	Photocopies	4.80
11/13/01	6	Photocopies	0.90
11/15/01	2	Photocopies	0.30

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Itemized Disbursements

Date	Qty	Description	Amount
11/16/01		Lexis	663.53
11/19/01	49	Photocopies	7.35
11/19/01	18	Photocopies	2.70
11/20/01		Long Distance Telephone: 4065232500	0.15
11/21/01	6	Photocopies	0.90
11/27/01	3	Photocopies	0.45
11/27/01	6	Photocopies	0.90
11/29/01	12	Photocopies	1.80
Total Disbursements:			\$ 1,027.49

Disbursement Summary

Photocopies	\$ 36.15
Facsimile	11.00
Long Distance Telephone	2.00
Travel Expense	271.35
Lexis	663.53
Other Meal Expenses	43.46
Total Disbursements:	\$ 1,027.49

Accounts Receivable Detail

Invoice	Date	Description	Amount
577764	10/30/01	Bill	5,425.00

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Regarding: Libby - Cost Recovery Case**Itemized Services**

Date	Tkpr	Description	Hours	Value
12/03/01	KWL	Review correspondence from DOJ re various stipulations (.30); telephone call to JFreeman re same (.70); meet with JDMcCarthy re case status and strategy (.50).	1.50	\$ 487.50
12/03/01	JDM	Outline administrative record comment issues (1.60); meet with CLNeitzel re comments to administrative record and relationship to litigation strategy (.80); prepare for discovery and strategy meeting with KWLund (.50); meet with KWLund re discovery/strategy (.50); telephone conference with J. Freeman re discovery and protective order (1.30); conference with JAHall re protective order (.10).	4.80	1,200.00
12/03/01	JAH	Conference with JMcCarthy regarding EPA request for protective order.	0.10	22.00
12/03/01	TWK	Research actions taken by EPA pursuant to time critical removals (.80); research EPA responses to Grace comments on official site record (.50).	1.30	143.00
12/04/01	JAH	Legal research regarding protective orders (1.00); consider and prepare revisions to protective order regarding confidential information (4.00).	5.00	1,100.00
12/05/01	JAH	Consider and prepare revisions to protective order regarding confidential information.	2.30	506.00
12/05/01	NKA	Meet with JSherman for instruction on W.R. Grace work to be done in Lotus Notes.	0.50	55.00
12/06/01	JDM	Meet with JAHall re DOJ request for protective order.	0.30	75.00
12/06/01	JAH	Conference with JMcCarthy regarding protective order (.30); consider and prepare revisions to protective order regarding confidential information (1.30).	2.00	440.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
12/07/01	JAH	Consider and prepare revision to protective order regarding confidential information.	1.00	220.00
12/10/01	JDM	Review and revise draft confidentiality protective order.	0.30	75.00
12/11/01	KWL	Telephone with Bill Corcoran and Bob Emmett re EPA approach in Libby (.40); telephone conference with EPA re Libby investigation and attic fill issues (1.0).	1.40	455.00
12/12/01	KWL	Review discovery requests and various EPA documents re developing expert witness strategy (2.0).	2.00	650.00
12/12/01	JDM	Review revised protective order re CBI (.30); draft letter to J. Freeman re CBI (.50); review draft status report and reply to DOJ (.20).	1.00	250.00
12/14/01	KWL	Prepare document profile for Peronard deposition outline (2.00).	2.00	650.00
12/16/01	JDM	Revise letter to J. Freeman re protective order.	0.50	125.00
12/17/01	GMB	Page by page review of Jorgenson pleadings, material received from Grace.	1.00	220.00
12/17/01	JAH	Consider and review cover letter and protective order regarding confidential information.	0.20	44.00
12/17/01	NKA	Coding W.R.Grace documents from NAberle CD in LotusNotes and documentary directory to correct intial coding.	6.20	682.00
12/18/01	GMB	Continue review of Jorgenson pleadings (2.00); continue review of Jorgenson pleadings file (5.00); conference with CLNeitzel re Jorgenson pleadings (.30); draft and edit memo re comments on Jorgenson case (1.30)	8.60	1,892.00
12/18/01	NKA	Coding W.R. Grace documents from NAberle CD in LotusNotes and Document Director.	3.50	385.00

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 Matter No.: 00302

Itemized Services

Date	Tkpr	Description	Hours	Value
12/19/01	GMB	Conference with CLNeitzel (.50); review Maynard letters, search supplemental admin record for Escherbach deposition (.50); review historical records from admin records for data on residential testing (2.00).	3.00	660.00
12/19/01	NKA	Coding W.R. Grace database from NAberle CD in LotusNotes and Document Director.	6.30	693.00
12/20/01	KWL	Review DOJ correspondence re protective order issues (1.0); telephone calls to Jim Freeman re negotiations on protective order and document production issues (1.30); draft and finalize discovery proposal to Jim Freeman (2.0).	4.30	1,397.50
12/20/01	JDM	Telephone conference with KWLund re stipulation re CBI (.20); telephone conference with J. Hall re stipulation (.20); telephone conference with J. Freeman re stipulation (.40).	0.80	200.00
12/20/01	GMB	Continue review of historical documents for information on residential testing in Libby (2.30); locate and provide serpentine rock documents to consultant (.30); review additional historic documents from supplemental administrative record for Escherbach deposition (.50); additional assistance to consultant re serpentine rock documents (.30); review of additional documents for possible inclusion into administrative record (1.00).	4.40	968.00
12/20/01	JAH	Receive and evaluate correspondence from J. Freeman at the Department of Justice re Protective Order (.2); perform legal research (.8); conference with JDMcCarthy re Protective Order (.5); consider and prepare correspondence to J. Freeman at the Department of Justice re Protective Order (.5); consider and revise Protective Order (1.2); telephone conference with JDMcCarthy and Jim Freeman at the Department of Justice re Protective Order.	4.00	880.00
12/21/01	JDM	Telephone conference with KWLund re stipulation and document production.	0.30	75.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
12/21/01	GMB	Search Jorgenson files for non-privileged documents to support comments (2.30); conference with CLNeitzel re supporting documentation (.50).	2.80	616.00
12/24/01	JDM	Review discovery responses and correspondence from EPA/DOJ.	0.80	200.00
12/26/01	KWL	Review Interrogatory responses received from EPA.	2.00	650.00
12/27/01	KWL	Prepare for meeting with litigation team (1.30); meet with Grace litigation team re case status and strategy (1.40); meet with Jennifer Hall re Jim Stout issues (.20); telephone conference with Jim Stout re witness preparation (.30); review EPA interrogatories and request for production (1.0)	4.20	1,365.00
12/27/01	JDM	Meeting with KWLund, JAHall, GMBarry, and EESTevenson re discovery issues (1.4); leave voice message and e-mail to J. Freeman re discovery (0.1); review discovery requests from U.S. (0.4); conference with JAHall re discovery responses and "meet and confer" letter (0.3).	2.20	550.00
12/27/01	EES	Case strategy conference call with KWLund, JDMcCarthy, GMBarry and JAHall (1.4); telephone conference with Dale Jensen re possible retention as our damage expert and clearing conflicts (.4).	1.80	378.00
12/27/01	GMB	Cost Recovery Team meeting with KWLund and JDMcCarthy to discuss strategic plan.	1.40	308.00
12/27/01	JAH	Strategy conference with KWLund; EESTevenson, GMBarry and JDMcCarthy (1.4); telephone conference with KWLund and Jim Stout of W.R. Grace (.2); conference with KWLund re witness preparation (.3); receive and evaluate correspondence from Jim Freeman of Department of Justice re discovery matters (.5); conference with JDMcCarthy re discovery status and protective orders (.3)	2.70	594.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
12/28/01	JAH	Receive and evaluate U.S. responses to Defendant's First Set of Interrogatories and Request for Production of Documents (2.0); receive and evaluate U.S. First Set of Interrogatories, Request for Production of Documents and Requests for Admissions (.6); legal research re local rules (.2); consider and prepare responses to U.S. First Set of Interrogatories and Requests for Production of Documents (1.5).	4.30	946.00
12/31/01	JAH	Consider and prepare correspondence to Jim Freeman at Department of Justice re U.S.' Responses to Defendants' First Set of Interrogatories and Requests for Production of Documents (1.20); consider and prepare responses to U.S.' First Set of Interrogatories (1.5).	2.70	594.00
Total Fees Through December 31, 2001:			93.50	\$ 20,751.00

Timekeeper Rate Summary*

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W. Lund	Partner	\$ 325.00	17.40	\$ 5,655.00
JDM	Jay D. McCarthy	Partner	250.00	11.00	2,750.00
EES	Edward E. Stevenson	Senior Counsel	210.00	1.80	378.00
GMB	Geoffrey M. Barry	Associate	220.00	21.20	4,664.00
JAH	Jennifer A. Hall	Associate	220.00	24.30	5,346.00
NKA	Natalie K. Aberle	Paralegal	110.00	16.50	1,815.00
TWK	Thomas W. Korver	Paralegal	110.00	1.30	143.00
Total Fees:			93.50	\$ 20,751.00	

*Please note that some individual timekeeper hourly rates have increased effective December 1, 2001

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Itemized Disbursements

Date	Qty	Description	Amount
11/01/01		Lexis	\$ 18.09
11/02/01		Lexis	33.17
11/05/01		Lexis	18.09
11/06/01		Lexis	23.12
11/07/01		Lexis	28.14
11/08/01		Lexis	18.09
11/09/01		Lexis	18.09
11/12/01		Lexis	23.12
11/13/01		Lexis	23.12
11/15/01		Lexis	23.12
11/16/01		Lexis	18.10
11/19/01		Lexis	43.23
11/20/01		Lexis	18.09
11/21/01		Lexis	18.10
11/22/01		Lexis	18.09
11/23/01		Lexis	18.10
11/26/01		Lexis	28.15
12/03/01	79	Photocopies	15.80
12/05/01		Lexis	18.09
12/05/01	835	Photocopies	167.00
12/05/01	749	Photocopies	149.80
12/06/01		Lexis	211.07
12/06/01		Lexis	28.14
12/07/01		Lexis	33.16
12/07/01		Lexis	95.49

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Itemized Disbursements

Date	Qty	Description	Amount
12/10/01		Lexis	18.09
12/10/01		Long Distance Telephone: 4065232543	0.43
12/10/01	4	Photocopies	0.60
12/10/01	2	Photocopies	0.40
12/17/01	18	Photocopies	3.60
12/19/01	5	Facsimile	5.00
12/19/01		Long Distance Telephone: 5613621542	0.15
12/19/01	2	Photocopies	0.40
12/20/01		Long Distance Telephone: 5016142834	0.15
12/20/01	48	Photocopies	9.60
12/29/01	24	Photocopies	3.60
12/29/01	16	Photocopies	2.40
12/29/01		Travel Expense: VENDOR: Kenneth W. Lund; INVOICE#: ER121001; DATE: 12/29/2001 - TE: 10/15 Columbia and Baltimore, Client meet with client	141.97
12/31/01	88	Photocopies	13.20
12/31/01	88	Photocopies	13.20
12/31/01	46	Photocopies	6.90
12/31/01	1	Photocopies	0.15
Total Disbursements:			\$ 1,326.40

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Disbursement Summary

Photocopies	\$	386.65
Facsimile		5.00
Long Distance Telephone		0.73
Travel Expense		141.97
Lexis		792.05
Total Disbursements:		\$ 1,326.40

Accounts Receivable Detail

Invoice	Date	Description	Amount
577764	10/30/01	Bill	5,425.00
		<i>Outstanding Balance on Invoice 577764:</i>	<u>\$ 5,425.00</u>
577905	10/31/01	Bill	64,445.24
		<i>Outstanding Balance on Invoice 577905:</i>	<u>\$ 64,445.24</u>
579873	11/20/01	Bill	35,721.27
		<i>Outstanding Balance on Invoice 579873:</i>	<u>\$ 35,721.27</u>
583055	12/27/01	Bill	10,820.49
		<i>Outstanding Balance on Invoice 583055:</i>	<u>\$ 10,820.49</u>
Total Outstanding Invoices:			\$ 116,412.00
Trust Applied to Matter			\$ 0.00
Current Fees and Disbursements			\$ 22,077.40
Total Balance Due This Matter			<u>\$ 138,489.40</u>

Casmalia Superfund Site - 00310

Description	October	November	December	Total
Photocopies	\$ 8.80	\$ -	\$ -	\$ 8.80
Facsimilies	\$ -	\$ -	\$ -	\$ -
Long Distance Telephone	\$ -	\$ -	\$ -	\$ -
Outside Courier	\$ -	\$ -	\$ -	\$ -
Travel Expenses	\$ -	\$ -	\$ -	\$ -
Lexis	\$ -	\$ -	\$ -	\$ -
Westlaw	\$ -	\$ -	\$ -	\$ -
Meal Expenses	\$ -	\$ -	\$ -	\$ -
Overtime	\$ -	\$ -	\$ -	\$ -
Other Expenses	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ 8.80	\$ -	\$ -	\$ 8.80

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Regarding: Casmalia Superfund Site

Itemized Disbursements

Date	Qty	Description	Amount
10/24/01	30	Photocopies	\$ 6.00
10/26/01	14	Photocopies	2.80
Total Disbursements:			\$ 8.80

Disbursement Summary

Photocopies	\$ 8.80
Total Disbursements:	\$ 8.80

Accounts Receivable Detail

Invoice	Date	Description	Amount
577743	10/30/01	Bill	4,831.12
<i>Outstanding Balance on Invoice 577743:</i>			<i>\$ 4,831.12</i>
577905	10/31/01	Bill	81.00
<i>Outstanding Balance on Invoice 577905:</i>			<i>\$ 81.00</i>
Total Outstanding Invoices:			\$ 4,912.12

Trust Applied to Matter	\$ 0.00
Current Fees and Disbursements	\$ 8.80
Total Balance Due This Matter	\$ 4,920.92

Kootenai Development/Corporation Transactions - 00320

Name	Position	Hourly Rate	TOTAL HOURS BILLED				Total Comp.
			October	November	December		
Kunstle, David	Associate	\$ 225.00	0.3	0	0	\$	67.50
Lutuda, Carla	Sr. Paralegal	\$ 90.00	0.3	0	0	\$	27.00
TOTAL			0.6	0	0	\$	94.50

Kootenai Development/Corporate Transactions - 00320

Description	October	November	December	Total
Photocopies	\$ -	\$ -	\$ -	\$ -
Facsimilies	\$ -	\$ -	\$ -	\$ -
Long Distance Telephone	\$ -	\$ -	\$ -	\$ -
Outside Courier	\$ -	\$ -	\$ -	\$ -
Travel Expenses	\$ -	\$ -	\$ -	\$ -
Lexis	\$ 470.54		\$ -	\$ 470.54
Westlaw	\$ -	\$ -	\$ -	\$ -
Meal Expenses	\$ -	\$ -	\$ -	\$ -
Overtime	\$ -	\$ -	\$ -	\$ -
Other Expenses	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ 470.54	\$ -	\$ -	\$ 470.54

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Regarding: Kootenai Development**Itemized Services**

Date	Tkpr	Description	Hours	Value
10/08/01	MCL	Draft letter to Albie Cohen transmitting check received from Phillips Petroleum.	0.30 \$	27.00
10/30/01	DPK	Conference with KATrammell re chain of title issues.	0.30	67.50
Total Fees Through October 31, 2001:			0.60 \$	94.50

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
DPK	David P. Kunstle	Associate	\$ 225.00	0.30 \$	67.50
MCL	M Carla. Latuda	Paralegal	90.00	0.30	27.00
Total Fees:				0.60 \$	94.50

Itemized Disbursements

Date	Qty	Description	Amount
10/01/01		Lexis	\$ 45.74
10/02/01		Lexis	21.66
10/03/01		Lexis	21.66
10/04/01		Lexis	21.66
10/05/01		Lexis	27.68
10/08/01		Lexis	27.68
10/09/01		Lexis	21.67
10/10/01		Lexis	21.66

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Itemized Disbursements

Date	Qty	Description	Amount
10/11/01		Lexis	33.69
10/12/01		Lexis	27.68
10/15/01		Lexis	33.69
10/16/01		Lexis	21.66
10/24/01		Lexis	27.67
10/25/01		Lexis	21.66
10/26/01		Lexis	27.66
10/29/01		Lexis	45.73
10/30/01		Lexis	21.69
Total Disbursements:			\$ 470.54

Disbursement Summary

Lexis	\$	470.54
Total Disbursements:	\$	470.54

Accounts Receivable Detail

Invoice	Date	Description	Amount
577746	10/30/01	Bill	2,628.81
<i>Outstanding Balance on Invoice 577746:</i>			<i>\$ 2,628.81</i>
577905	10/31/01	Bill	12,989.00
<i>Outstanding Balance on Invoice 577905:</i>			<i>\$ 12,989.00</i>

Bankruptcy Matters - 00390

Name	Position	Hourly Rate	TOTAL HOURS BILLED				Total Comp.
			October	November	December		
Lund, Kenneth	Partner	\$ 300.00	2	0	0	\$	600.00
Lund, Kenneth	Partner	\$ 325.00	0	0	0	\$	-
Flaagan, Elizabeth	Partner	\$ 250.00	11.1	7.9	0	\$	4,750.00
Flaagan, Elizabeth	Partner	\$ 265.00	0	0	3.8	\$	1,007.00
Haag, Susan	Paralegal	\$ 85.00	14.5	6.7	7.6	\$	2,448.00
TOTAL			27.6	14.6	11.4	\$	8,805.00

Bankruptcy Matters - 00390

Description	October	November	December	Total
Photocopies	\$ 4.00	\$ 22.50	\$ 45.60	\$ 72.10
Facsimilies	\$ -	\$ -	\$ -	\$ -
Long Distance Telephone	\$ -	\$ -	\$ -	\$ -
Outside Courier	\$ -	\$ 16.36	\$ 56.91	\$ 73.27
Travel Expenses	\$ -	\$ -	\$ -	\$ -
Lexis	\$ -	\$ -	\$ -	\$ -
Westlaw	\$ -	\$ -	\$ -	\$ -
Meal Expenses	\$ -	\$ -	\$ -	\$ -
Overtime	\$ -	\$ -	\$ -	\$ -
Other Expenses	\$ -	\$ -	\$ -	\$ -
Word Processing	\$ 150.00	\$ -	\$ -	\$ 150.00
				\$ -
TOTAL	\$ 154.00	\$ 38.86	\$ 102.51	\$ 295.37

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Regarding: Bankruptcy Matters**Itemized Services**

Date	Tkpr	Description	Hours	Value
09/26/01	EKF	E-mails to and from Sam Schwartz re fee application issues (.1); review administrative order establishing procedures for compensation of professionals (.1); review bankruptcy court database for fee information (.4).	0.40 \$	100.00
10/25/01	SH	Review and compile invoices for fee application.	0.50	42.50
10/26/01	EKF	Telephone conferences with KWLund re fee application (.2) begin review of documents and drafting first and second quarter fee application and supporting exhibits/summaries (2.7); conferences with SMHaag re same (.2).	3.10	775.00
10/26/01	SH	Review bills and Delaware fee application (2.0); search Delaware system for fee applications (1.8).	2.80	238.00
10/27/01	EKF	Conferences with SMHaag re drafting fee application and exhibits (.3); continue drafting first and second quarter fee application (2.0).	2.30	575.00
10/27/01	SH	Assemble information for fee application.	1.00	85.00
10/29/01	KWL	Review final application for fees and expenses.	2.00	600.00
10/29/01	EKF	Continue drafting quarterly fee application and exhibits/summaries in support thereof (2.5); conferences with SMHaag re exhibits/summaries for fee application (.4); e-mails to and from Sam Schwartz re same (.2).	3.10	775.00
10/29/01	SH	Assemble information for fee application.	4.80	408.00
10/30/01	EKF	Numerous conferences with Ken Lund and SMHaag re fee application, time entries and supporting exhibits.	0.50	125.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
10/30/01	SH	Several conferences with KWLund, CSGraham and TLWorthington re bills for fee application (.40); create charts for fee application (2.0); conference with TLWorthington re breakdown of charts (.70).	2.40	204.00
10/31/01	EKF	Continue drafting, revising and reviewing supporting documents/exhibits for quarterly fee application (1.5); e-mails to and from David Carickhoff re fee application (.2); conferences with SMHaag re drafting and exhibits (.2).	1.70	425.00
10/31/01	SH	Revise charts for fee application (2.0); review bills for fee application (1.40).	3.00	255.00

Total Fees Through October 31, 2001: 27.60 \$ 4,607.50

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
KWL	Kenneth W. Lund	Partner	\$ 300.00	2.00	\$ 600.00
EKF	Elizabeth Flaagan	Senior Associate	250.00	11.10	2,775.00
SH	Susan Haag	Paralegal	85.00	14.50	1,232.50

Total Fees: 27.60 \$ 4,607.50

Itemized Disbursements

Date	Qty	Description	Amount
10/29/01	20	Photocopies	\$ 4.00
10/31/01		Word Processing: Word Processing 10/29/2001 C Kropp	6.25
10/31/01		Word Processing: Word Processing 10/29/2001 C Millins,Kropp,Namaste	143.75

Total Disbursements: \$ 154.00

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Disbursement Summary

Photocopies	\$	4.00
Word Processing		150.00
Total Disbursements:	\$	154.00

Accounts Receivable Detail

Invoice	Date	Description	Amount
577655	10/26/01	Bill	10,008.00
		<i>Outstanding Balance on Invoice 577655:</i>	<i>\$ 10,008.00</i>
Total Outstanding Invoices:			\$ 10,008.00

Trust Applied to Matter	\$ 0.00
Current Fees and Disbursements	\$ 4,761.50
Total Balance Due This Matter	\$ 14,769.50

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 Invoice No.: 583055
 Client No.: 04339
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Regarding: Bankruptcy Matters**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/01/01	EKF	Finalize drafting of application of first quarter compensation and supporting documents.	3.00	\$ 750.00
11/14/01	EKF	Review invoices and draft first monthly fee application and supporting documents.	2.50	625.00
11/19/01	SH	Draft charts for monthly fee statement.	4.30	365.50
11/20/01	EKF	Review and finalize monthly fee application and supporting documents/exhibits (.8); draft letter to David Carickhoff, Esq., re same (.3).	1.10	275.00
11/20/01	SH	Finalize monthly fee statement (.5); review and revise (.7); compile for filing (1.2).	2.40	204.00
11/28/01	EKF	Emails to and from U.S. Trustee's office re HRO fee applications (.20); draft email to local counsel re CNO and agreed-upon reductions (.20); draft email to HRO attorneys re fee/expense guidelines for Delaware fee applications (.20); review monthly fee application (October) for compliance with Delaware Local Rules (.50); conference with KJCoggon re fee/billing guidelines (.20).	1.30	325.00
Total Fees Through November 30, 2001:			14.60	\$ 2,544.50

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
EKF	Elizabeth Flaagan	Senior Associate	\$ 250.00	7.90	\$ 1,975.00
SH	Susan Haag	Paralegal	85.00	6.70	569.50
Total Fees:				14.60	\$ 2,544.50

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Itemized Disbursements

Date	Qty	Description	Amount
11/08/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-28286; DATE: 11/8/01 - Courier, Acct. 0802-0410-8 11-01; David W Carick Wilmington, De	\$ 16.36
11/21/01	150	Photocopies	22.50
Total Disbursements:			\$ 38.86

Disbursement Summary

Photocopies	\$ 22.50
Outside Courier	16.36
Total Disbursements:	\$ 38.86

Accounts Receivable Detail

Invoice	Date	Description	Amount
577655	10/26/01	Bill	10,008.00
		<i>Outstanding Balance on Invoice 577655:</i>	<i>\$ 10,008.00</i>
579873	11/20/01	Bill	4,761.50
		<i>Outstanding Balance on Invoice 579873:</i>	<i>\$ 4,761.50</i>
Total Outstanding Invoices:			\$ 14,769.50

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Matter No.: 00390

Regarding: Bankruptcy Matters**Itemized Services**

Date	Tkpr	Description	Hours	Value
12/06/01	EKF	Draft CNO for first quarter fee application and revise proposed order for same (.4); draft e-mail to Patty Cuniff re filing CNO (.1).	0.50	\$ 132.50
12/10/01	EKF	Review court's order referring certain cases to bankruptcy court and allocating responsibility between the district court and the bankruptcy court (.2).	0.20	53.00
12/20/01	EKF	Review Bankruptcy Court docket for objections to Monthly Fee Application (.2); draft email to Patricia Cuniff re same and CNO (.1).	0.30	79.50
12/21/01	EKF	Conference with KWLund re fee issues (.1); conference with SMHaag re November fee application (.2); review recent bankruptcy court pleadings including first Case Management Order (.3).	0.60	159.00
12/21/01	SH	Review pre-bill for fee statement.	0.50	42.50
12/24/01	EKF	Review November pre-bills and exercise billing judgment (.7).	0.70	185.50
12/26/01	SH	Review and revise pre-bills for fee statement.	1.00	85.00
12/27/01	SH	Draft and calculate charts for fee application (3.6); draft fee application; summary and order (2.0).	5.60	476.00
12/28/01	EKF	Review and revise monthly fee application for November, including drafting of exhibits.	1.50	397.50
12/28/01	SH	Finalize fee application for filing.	0.50	42.50

Total Fees Through December 31, 2001: 11.40 \$ 1,653.00

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Timekeeper Rate Summary*

Initials	Name	Rank	Rate	Hours	Value
EKF	Elizabeth Flaagan	Partner	\$ 265.00	3.80	\$ 1,007.00
SH	Susan Haag	Paralegal	85.00	7.60	646.00
Total Fees:				11.40	\$ 1,653.00

*Please note that some individual timekeeper hourly rates have increased effective December 1, 2001

Itemized Disbursements

Date	Qty	Description	Amount
11/29/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-027-29365; DATE: 11/29/01 - Courier, Acct. 0802-0410-8 11-21; David W Carickhoff Wilmington, De	\$ 56.91
12/27/01	85	Photocopies	12.75
12/28/01	219	Photocopies	32.85
Total Disbursements:			\$ 102.51

Disbursement Summary

Photocopies	\$ 45.60
Outside Courier	56.91
Total Disbursements:	\$ 102.51

Accounts Receivable Detail

Invoice	Date	Description	Amount
577655	10/26/01	Bill	10,008.00
<i>Outstanding Balance on Invoice 577655:</i>			<i>\$ 10,008.00</i>

Boston Document Production - 00400

Name	Position	Hourly Rate	TOTAL HOURS BILLED			Total Comp.
			October	November	December	
Lund, Kenneth W.	Partner	\$ 300.00	0	0	0	\$ -
Lund, Kenneth W.	Partner	\$ 325.00	0	0	1.8	\$ 585.00
Neitzel, Charlotte L.	Partner	\$ 275.00	0	2.8	0	\$ 770.00
Coggon, Kathryn	Sr. Associate	\$ 240.00	0	33.7	1.8	\$ 8,520.00
Tracy, Brent	Associate	\$ 210.00	0	42	6.6	\$ 10,206.00
Barry, Geoffrey M	Associate	\$ 220.00	0	0	46.8	\$ 10,296.00
Hall, Jennifer	Associate	\$ 220.00	0	43.7	43.5	\$ 19,184.00
Tygart, Travis	Associate	\$ 175.00	0	54.7	0	\$ 9,572.50
Perruso, Roxane	Associate	\$ 210.00	0	0	80.4	\$ 16,884.00
Wall, Douglas	Associate	\$ 185.00	0	0	61.8	\$ 11,433.00
Bono, Eric	Associate	\$ 175.00	0	0	3.3	\$ 577.50
Aberte, Natalie	Paralegal	\$ 110.00	0	0	59.9	\$ 6,589.00
Aberte, Natalie	Paralegal	\$ 100.00	0	8.7	0	\$ 870.00
Wingard, Johncie	Paralegal	\$ 110.00	0	101	0	\$ 11,110.00
Korver, Thomas	Sr. Paralegal	\$ 110.00	0	52.1	40.6	\$ 10,197.00
Sherman, Joan	Sr. Paralegal	\$ 110.00	0	102.8	74.8	\$ 19,536.00
Latuda, Carla	Sr. Paralegal	\$ 90.00	0	116.3	96.1	\$ 19,116.00
Street, Loraine	Paralegal	\$ 85.00	0	60.5	47.3	\$ 9,163.00
Haag, Susan	Paralegal	\$ 85.00	0	0	51	\$ 4,335.00
Floyd, Mary Beth	Info. Specialist	\$ 90.00	0	0.4	47	\$ 4,266.00
Mulholland, Imelda	Info. Specialist	\$ 90.00	0	0	41.6	\$ 3,744.00
Payne, William	Info. Specialist	\$ 75.00	0	78.8	0	\$ 5,910.00
Payne, William	Info. Specialist	\$ 85.00	0	0	25.6	\$ 2,176.00
TOTAL			0	697.5	729.9	\$ 185,040.00

Boston Document Review - 00400

Description	October	November	December	Total
Photocopies	\$ -	\$ 7.50	\$ 45.80	\$ 53.30
Facsimilies	\$ -	\$ 4.00	\$ 4.00	\$ 8.00
Long Distance Telephone	\$ -	\$ 8.51	\$ 0.80	\$ 9.31
Outside Courier	\$ -	\$ 177.22	\$ 131.52	\$ 308.74
Travel Expenses	\$ -	\$ 11,615.84	\$ 17,980.48	\$ 29,596.32
Lexis	\$ -	\$ -	\$ -	\$ -
Westlaw	\$ -	\$ -	\$ -	\$ -
Meal Expenses	\$ -	\$ 715.93	\$ 2,268.03	\$ 2,983.96
Overtime	\$ -	\$ 3,601.25	\$ 1,598.25	\$ 5,199.50
Other Expenses	\$ -	\$ -	\$ -	\$ -
TOTAL	\$ -	\$ 16,130.25	\$ 22,028.88	\$ 38,159.13

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Regarding: Boston Document Production**Itemized Services**

Date	Tkpr	Description	Hours	Value
11/01/01	KJC	Prepare for Grace meeting re document review (.2); meeting re document review with CCotts, MThompson, CLatuda, JLSherman and BPayne (1.3); conference with BATracy re document review and production issues (.4); followup to document review meetings (.4); telephone conference with Richard Finke re document review issues (.2); review instructions and target sheet, review EPA requests to identify issues for additional coding (1.3); review database for issues and email group re same (.9); telephone conference with Matt Murphy re changes to instructions and startup issues(.2); email to George Thornton re missed deadline for target sheet (.2); conference with KWLund re status (.3).	5.40	\$ 1,296.00
11/01/01	BAT	Conference with KJCoggon re database and production logistics (0.4); conference with KWLund re review groundrules and issue same (0.2); telephone conference with Jack McFarland re South Carolina property descriptions for response to 6th Information Request (0.1)	0.70	147.00
11/01/01	MCL	Conference with KCoggon, JSherman, CCotts, MThompson and BPayne re resumption of scanning project and various issues concerning database management including quality control of images (1.3 hrs.); read and respond to e-mails re resumption of document review and issues concerning preparation of new target sheet (1.7 hrs.); review draft of Document Review Guidelines (.3 hrs.); locate and assemble documents for use in Boston review (1.2 hrs.)	4.50	405.00
11/01/01	JLS	Meeting with KJCoggon, CLatuda, CCotts, MThompson, BTracy and BPayne re docuemnt review procedures and updated target sheet (1.3), review EPA 104(e) requests (1.2).	2.50	275.00

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Date	Tkpr	Description	Hours	Value
11/01/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	7.50	637.50
11/02/01	KJC	Finalize materials for restart of document review (3.1); conference with Geoff Barry re document review work (.2); conference with CCotts, BPayne re database issues and corrections (1.5); telephone conference with BATracy re EPA issue coding (.3); follow-up regarding database repair (.3); telephone conference with Susan Haines re target sheet (.2); telephone conference with George Thornton re target sheet and data base (.5).	6.10	1,464.00
11/02/01	BAT	Review EPA issues list for additional data base review (0.5); conference with KJCoggon re same (0.5); review e-mails re scanner issues (0.2).	1.20	252.00
11/02/01	MCL	Read and respond to e-mails re document review protocol and various database issues (.5 hrs.); review and edit documents to be included in document production "Quick Reference Guide" (.8 hrs.); locate and organize documents to utilize in preparing personnel for document review (1.7 hrs.); telephone conference with JSherman re various tasks needing completion at Cambridge site and organization of work space at Cambridge (.3 hrs.).	3.30	297.00
11/02/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	7.50	637.50
11/03/01	KJC	Review revised target sheet and email exchange with George Thornton re same.	0.50	120.00
11/04/01	MCL	Review revised document review guidelines and associated emails while traveling to Boston (2.4 N.C.).	4.80	432.00
11/04/01	JLS	Travel to Boston while reviewing document review procedures (2.4 N.C.).	4.80	528.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/04/01	JW	Travel to Boston and review current document review procedures and information re responsiveness to EPA requests (4.4 N.C.).	5.60	616.00
11/05/01	KJC	Telephone conference with Susan Haines re document review restart issues (.3); email George Thornton re revisions to target sheet (.2); conference with Chris Cotts re database coordination (.2); document review restart including email exchanges with team (.8); address document review issues (1.3); telephone conference with Susan Haines re database (.3); telephone conference with BATracy re document review schedule(.2).	3.30	792.00
11/05/01	BAT	Telephone conference with KJCoggon re schedule for full resumption of review (0.2); telephone conference with CLatuda re schedule and questions (0.2); review and respond to e-mails re target sheet (0.3); reschedule travel to Boston (0.1).	0.80	168.00
11/05/01	MCL	Conference at Winthrop Square with Matt Murphy, Susan Haines, JSherman, JWingard and veteran temps re: resumption of document review and changes to document coding protocol (1.9 hrs.); begin organizing and replacing target sheets in boxes that were ready to be scanned at Cambridge location (7.0 hrs.)	8.90	801.00
11/05/01	JLS	Review documents for responsiveness to EPA 104(e) requests and class action requests and replace target sheets in boxes that were ready for scanning in Cambridge (7.4 hrs.); telephone conferences with CLatuda, KCoggon and Matt Murphy re document review procedures and protocols (.4 hrs.)	8.00	880.00
11/05/01	JW	Attend meeting at Winthrop with MMurphy to go over review procedures and new target sheets (2.0); review documents at Cambridge re responsiveness to EPA information requests (7.0).	9.00	990.00

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Date	Tkpr	Description	Hours	Value
11/06/01	KJC	Respond to questions regarding document review.	1.30	312.00
11/06/01	JAH	Conference with BTracy re document review.	0.40	88.00
11/06/01	BAT	Review and respond to e-mails re new document review procedures (.40); conference with JAHall re document review procedures (.40).	0.80	168.00
11/06/01	MCL	Review and replace target sheets in boxes that were ready for scanning at Winthrop Square location (7.0 hrs.); telephone conferences with MMurphy, SHaines, and JSherman re: document review issues and changes in protocol (1.2 hrs.); conferences with temps re: questions on new document review procedures (1.50).	9.70	873.00
11/06/01	JLS	Review documents for responsiveness to EPA 104(e) requests and class action requests and replace target sheets in boxes that were ready for scanning in Cambridge (9.0 hrs.); telephone conferences with CLatuda and KCoggon re document review procedures and protocols (.5 hrs.).	9.50	1,045.00
11/06/01	JW	Review documents at Cambridge for responsiveness to EPA information requests (9.7); make arrangements with travel agent for trip on 11/26 (.30).	10.00	1,100.00
11/07/01	KJC	Review and respond to emails re document review.	0.60	144.00
11/07/01	JAH	Review background materials re document review procedures.	6.00	1,320.00

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Date	Tkpr	Description	Hours	Value
11/07/01	MCL	Review and replace target sheets in boxes that were ready for scanning at Cambridge (5.0 hrs.); telephone conference with Matt Murphy re: assessment of boxes returned by Lason (.2 hrs.); review same to determine number of boxes that were scanned, but not loaded to CD's, number of boxes that were prepped, but not scanned; and number of boxes that were not prepped or scanned; prepare list of same (2.8 hrs.); read and respond to various emails re: document review protocol (.1.2 hrs.); telephone conference with JSherman re: various document review and scanner issues (.5 hrs.).	9.70	873.00
11/07/01	JLS	Review documents for responsiveness to EPA 104(e) requests and class action requests and replace target sheets in boxes that were ready for scanning at Winthrop Square (8.0 hrs.); telephone conferences with CLatuda and KCoggon re document review procedures and protocols (.5 hrs.); conferences with Winthrop Square temps re coding issues and document responsiveness issues (.6 hrs.).	9.10	1,001.00
11/07/01	JW	Review documents at Cambridge for responsiveness to EPA information requests.	10.50	1,155.00
11/08/01	KJC	Review and respond to emails re document review.	0.30	72.00
11/08/01	MCL	Review and replace target sheets in boxes that were ready for scanning at Winthrop Square (7.5 hrs.); telephone conferences with JSherman, Matt Murphy and Susan Haines re: document review procedures and protocols (.4 hrs.); conferences with Winthrop Square temps re: coding issues and document responsiveness issues (.6 hrs.).	8.50	765.00
11/08/01	JLS	Review documents for responsiveness to EPA 104(e) requests and class action requests and replace target sheets in boxes that were ready for scanning in Cambridge (8.3); telephone conferences with CLatuda, KJCoggon and Matt Murphy re document review procedures and protocols (.6).	8.90	979.00

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Date	Tkpr	Description	Hours	Value
11/08/01	JW	Review documents at Cambridge for responsiveness to EPA information requests.	10.50	1,155.00
11/08/01	MBF	Check Federal Register re NPL and Libby (.30); call Kelcey Land re missing images from first Admin. Record CD(.10).	0.40	36.00
11/08/01	WEP	Load missing images from Grace Administrative Records into image directory (3.0); Make 5 copies of CD "Grace Administrative Records Updated"(1.0).	4.00	300.00
11/09/01	KJC	Address document review issues including email exchanges with document review team and scanning vendor (2.7).	2.70	648.00
11/09/01	MCL	Review and replace target sheets in boxes that were ready for scanning at Cambridge (5.5 hrs.); review various email correspondence re: document review issues and protocols and re-read 104(e) requests (2.0); travel to Denver (2.0 hrs.) (2.0 N.C.).	9.50	855.00
11/09/01	JLS	Review documents for responsiveness to EPA 104(e) requests and class action requests and replace target sheets in boxes that were ready for scanning at Winthrop Square (5.0); telephone conferences with CLatuda and KJCoggon re document review procedures and protocols (.3); conferences with Winthrop Square temps re coding issues and document responsiveness issues (.6); review document review procedures (2.0); travel to Denver (2.0) (2.0 N.C.).	9.90	1,089.00
11/09/01	JW	Review documents at Cambridge for responsiveness to EPA information requests (6.0); travel from Boston to Colorado Springs (4.0) (4.0 N.C.).	10.00	1,100.00
11/09/01	WEP	Organize and label CD's.	1.50	112.50
11/10/01	TWK	Review guidelines and document procedures in preparation for document review.	0.50	55.00
11/11/01	CLN	Draft outline for Administrative Record.	2.80	770.00

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Date	Tkpr	Description	Hours	Value
11/11/01	TTT	Review document and procedures for EPA requests (0.8); travel to Boston for Grace document review (3.5) (3.5 N.C.)	4.30	752.50
11/11/01	TWK	Travel to Boston for document review in response to EPA 104(e) requests and litigation discovery (2.9) (2.9 N.C.); review document procedure production guidelines (.30).	3.20	352.00
11/11/01	MCL	Review 104(e) requests and emails from prior week re document review protocol and procedures (1.0); travel to Boston (2.5) (2.5 N.C.).	3.50	315.00
11/12/01	KJC	Address document review issues including email exchanges with document review team and scanning vendor (1.0).	1.00	240.00
11/12/01	JAH	Review background materials for document production.	2.00	440.00
11/12/01	BAT	Review and respond to questions from Cambridge review.	0.30	63.00
11/12/01	TTT	Review Grace documents for responsiveness to EPA requests.	10.80	1,890.00
11/12/01	TWK	Review documents at Grace Cambridge headquarters in response to EPA 104(e) request and litigation discovery (10.00).	10.00	1,100.00
11/12/01	MCL	Review and replace target sheets in boxes at Cambridge that had been previously target sheeted for scanning (7.9 hrs.); telephone conferences with MMurphy, JSherman, and SHaines re questions on changes to target sheet and review (.8 hrs.); read and respond to various emails concerning changes to target sheet and document review protocols (.6 hrs.); conferences with temp., TKorver and TTygart re coding issues and document responsiveness issues (.7 hrs.).	10.00	900.00
11/12/01	WEP	Export images from Document Director and create 5 CDs(T CD0004-T CD0008) of images for coding QC	7.00	525.00
11/13/01	KJC	Review and respond to emails re document review (2.20).	2.20	528.00

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Date	Tkpr	Description	Hours	Value
11/13/01	BAT	Review and respond to e-mails re coding issues (0.3); answer questions of Cambridge reviewers (0.3); manage issues re document production strategy and planning (0.4).	1.00	210.00
11/13/01	TTT	Review Grace documents for responsiveness to EPA requests.	10.50	1,837.50
11/13/01	TWK	Review documents at Grace Cambridge headquarters in response to EPA 104(e) request and litigation discovery (10.80).	10.80	1,188.00
11/13/01	MCL	Review and replace target sheets in boxes at Cambridge that had been previously target sheeted for scanning (8.4 hrs.); read and respond to various emails re coding issues and target sheet changes and issues (1.1 hrs.).	9.50	855.00
11/13/01	JLS	Review recent e-mails and update Helpful Hints document for Boston review team.	2.90	319.00
11/13/01	WEP	Find missing images from "Grace Administrative Records" CD and begin printing documents out for scanning	4.30	322.50
11/14/01	KJC	Conference with JLSherman re Libby document review (0.2); review and respond to emails re document review questions (0.7); draft email response to Bob Emmett re document review (0.5).	1.40	336.00
11/14/01	TTT	Review Grace documents for responsiveness to EPA requests.	10.30	1,802.50
11/14/01	TWK	Review documents at Grace Cambridge headquarters in response to EPA 104(e) request and litigation discovery (10.80).	10.80	1,188.00
11/14/01	MCL	Review and replace target sheets in boxes at Cambridge that had been previously target sheeted for scanning (9.2 hrs.); read and respond to various emails re coding issues (.7 hrs.).	9.90	891.00

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Date	Tkpr	Description	Hours	Value
11/14/01	JLS	Review recent e-mails and update document review guidelines for Boston review team.	1.80	198.00
11/15/01	KJC	Review and respond to emails re test data from scan company including conference with BEPayne re loading and reviewing data in our database (1.9); review test data and images (0.9); telephone conference with George Thornton re corrections to test data (0.3); review and respond to emails and calls re document review (0.2).	3.30	792.00
11/15/01	BAT	Review and respond to e-mails re document production procedures and guidelines (0.2); answer questions of the Cambridge reviewers (0.2); conference with NKABerle re guidelines for document production (0.5)	0.90	189.00
11/15/01	TTT	Review Grace documents for responsiveness to EPA requests.	8.30	1,452.50
11/15/01	NKA	Meet with BTracy to discuss Boston document production; schedule trip to Boston.	0.70	70.00
11/15/01	TWK	Review documents at Grace Cambridge headquarters in response to EPA 104(e) request and litigation discovery (8.30).	8.30	913.00
11/15/01	MCL	Review and replace target sheets in boxes at Winthrop Square that had been previously target sheeted for scanning (7.1 hrs.); telephone conferences with MMurphy, JSherman and SHaines re document review issues and scanner issues (.5 hrs.).	8.20	738.00
11/15/01	JLS	Edit document review guidelines and e-mail for comments (.9); telephone conferences with CLatuda and KCoggon re document responsiveness issues (.8)	1.70	187.00
11/15/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	6.50	552.50

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Date	Tkpr	Description	Hours	Value
11/15/01	WEP	Scan, QC, export and import batch EPA AR3 (2371 total images); Make backup copies of T CDs 1 through 8; Load test data into new document director database	7.30	547.50
11/16/01	KJC	Review and revise document review helpful tips including email exchange with JLSherman (0.6).	0.60	144.00
11/16/01	BAT	Review and comment re revisions to helpful tips document.	0.20	42.00
11/16/01	TTT	Review Grace documents for responsiveness to EPA requests (6.5); travel from Boston to Colorado Springs (4.0) (4.0 N.C.).	10.50	1,837.50
11/16/01	TWK	Review documents at Grace Cambridge headquarters in response to EPA 104(e) request and litigation discovery (5.50); return to Denver from Grace headquarters (3.00) (3.0 N.C.).	8.50	935.00
11/16/01	MCL	Review box of maps that were returned by Lason to determine which Grace boxes they originated from and create index of same (4.9 hrs.); read and review newest edited version of Document Review Guidelines while traveling to Denver (3.3 hrs.) (2.7 N.C.).	8.20	738.00
11/16/01	JLS	Review and respond to e-mails re document review procedures and edit document review guidelines (2.3)	2.30	253.00
11/16/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	7.50	637.50
11/16/01	WEP	Export images from Document Director and create 4 CDs(T CD0009-T CD0012) of images for coding QC	7.00	525.00
11/19/01	BAT	Review and comment re revisions to document review guidelines.	0.70	147.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/19/01	JLS	Review and respond to e-mails re document review procedures and edit document review guidelines (.8); Telephone conferences with KCoggon and CLatuda re same (.6)	1.40	154.00
11/19/01	WEP	Export images from Document Director and create 3 CDs(T CD0013-T CD0015) of images for coding QC	6.80	510.00
11/20/01	KJC	Telephone conferences with JLSherman re database edits (.4).	0.40	96.00
11/20/01	NKA	Read important sections of W.R. Grace document production/history manual.	6.50	650.00
11/20/01	MCL	Read and respond to various e-mails re: document review protocols and scanning issues (.6 hrs.); conference with JSherman re: document review status (.4 hrs.).	1.00	90.00
11/20/01	JLS	Conferences with KCoggon and review e-mails re document database coding issues (.6)	0.60	66.00
11/20/01	WEP	Export images from Document Director and create 1 CD(T CD0016) of images for coding QC; Make backup copy of CDs 9 through 16	7.30	547.50
11/21/01	BAT	Answer question re review of documents in Cambridge.	0.10	21.00
11/21/01	NKA	Read W.R. Grace Quick Reference Guide in preparation for Boston document production.	1.50	150.00
11/26/01	KJC	Draft email re database review, travel work, and EPA issue coding (.4); conference with CCotts re database readiness for edits (.2).	0.60	144.00
11/26/01	BAT	Review document review tips and prepare training for incoming temp works (.5); travel to Boston for document review (2.8) (2.8 N.C.).	3.30	693.00
11/26/01	JLS	Travel to Boston (3.0) (3.0 N.C.).	3.00	330.00

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Date	Tkpr	Description	Hours	Value
11/26/01	JW	Travel to Boston for document review (3.5) (3.5 N.C.).	3.50	385.00
11/26/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	5.00	425.00
11/26/01	WEP	Export images from Document Director and create 3 CDs(T CD0017-T CD0019) of images for coding QC	7.00	525.00
11/27/01	KJC	Review and respond to email re document review and scanning.	0.50	120.00
11/27/01	JAH	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits (8.8), conferences with BATracy and JLSherman re: document review protocols (.5).	9.30	2,046.00
11/27/01	BAT	Review documents in Cambridge for responsiveness, target for scanning, answer questions of other reviewers, and prep boxes for transfer to Winthrop Square (7.3); train JAHall in document review process (0.5).	7.80	1,638.00
11/27/01	MCL	Read and respond to various e-mails re: document review guidelines and protocols (.7 hrs.); telephone conference with JLSherman re: Cambridge document reievew (.2 hrs.).	0.90	81.00
11/27/01	JLS	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits including train and supervise temporary employees, conferences with BATracy re document review protocols	9.00	990.00
11/27/01	JW	Review documents at Cambridge for responsiveness to EPA and plaintiff requests, including coding of same.	10.50	1,155.00
11/27/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	6.00	510.00

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Date	Tkpr	Description	Hours	Value
11/27/01	WEP	Export images from Document Director and create 3 CDs (T CD0020-T CD0022) of images for coding QC	7.30	547.50
11/28/01	KJC	Address billing practices in light of bankruptcy trustee requirements (0.2); review and respond to emails re document review questions (0.3); review memo to document review team re procedures for electronic review and coding (0.2); address scan vendor test data including telephone conferences with George Thornton at ONSS and Matt Murphy (0.6).	1.30	312.00
11/28/01	JAH	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits (9.5).	9.50	2,090.00
11/28/01	BAT	Review documents in Cambridge for responsiveness, target for scanning, and answer questions of other reviewers.	8.10	1,701.00
11/28/01	MCL	Read and respond to e-mails re: scanner issues and review of scanner's test data (.8 hrs.); telephone conference with JSherman re: pick-up of boxes by ONSS and space concerns at Cambridge (.3 hrs.).	1.10	99.00
11/28/01	JLS	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits including train and supervise temporary employees, conferences with BATracy re document review protocols and read and respond to e-mails re same	8.00	880.00
11/28/01	JW	Review documents at Cambridge for responsiveness to EPA and plaintiff requests, including coding of same.	10.30	1,133.00
11/28/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	5.50	467.50
11/28/01	WEP	Fix imports for CDs 98 through 101 in Lotus Notes; Meet with CCotts and TENriquez regarding updating production dates in Lotus Notes	5.00	375.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/29/01	KJC	Telephone conference with George Thornton and email exchanges re scan vendor test data (.6); coordinate access for document review team to various databases and review tools (.6); telephone conferences with CLatuda re data review (.5).	1.70	408.00
11/29/01	JAH	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits (8.5).	8.50	1,870.00
11/29/01	BAT	Review documents in Cambridge for responsiveness, target for scanning, and answer questions of other reviews (8.9); telephone conference with Pauline Chan re reviewing old research notebooks in basement vault (0.3).	9.20	1,932.00
11/29/01	MCL	Conference with KCoggon re: review of database of documents scanned by Lason and staffing issues in Boston (.30 hrs).	0.30	27.00
11/29/01	JLS	Review and respond to emails re document review procedures (1.7); Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits including train and supervise temporary employees and conferences with BATracy re document review protocols (7.3)	9.00	990.00
11/29/01	JW	Review documents at Cambridge re responsiveness to EPA and plaintiff requests, including coding of same.	10.30	1,133.00
11/29/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	7.50	637.50
11/29/01	WEP	Export images from Document Director and create 4 CDs (T CD0023-T CD0026) of images for coding QC	7.30	547.50
11/30/01	KJC	Telephone conference with Chris Cotts re database (.2); review and respond to emails re document review and scanning vendor issues (.3).	0.50	120.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
11/30/01	JAH	Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits (5.0); travel from Boston to Denver (3.0) (3.0 N.C.).	8.00	1,760.00
11/30/01	BAT	Review documents in Cambridge for responsiveness, target for scanning, and answer questions of other reviewers (3.4); conference with Jennifer Umali re reviewing old research notebooks n basement vault and review vault storage to plan review (0.5); travel from Boston to Denver (3.0) (3.0 N.C.).	6.90	1,449.00
11/30/01	MCL	Conference with KCoggon re: review of test data received from ONSS (.20 hrs.); review test data and draft e-mail discussing concerns and problems with test data (2.7 hrs.); read and respond to e-mails re: questions and issues concerning document coding, pick up of boxes on 12/3 by ONSS, protocol and procedures for review at Cambridge (.6 hrs.); conferences with CCotts and BPayne re: concerns with database and images on laptop computers for electronic coding project 1.3 hrs.).	4.80	432.00
11/30/01	JLS	Review and respond to emails re document review procedures (1.4); Review and QC documents in Cambridge for EPA Fourth Request for Information, supplemental production and class action lawsuits including train and supervise temporary employees and conferences with BATracy re document review protocols (6.0); travel to Denver (3.0) (3.0 N.C.).	10.40	1,144.00
11/30/01	JW	Review documents at Cambridge re responsiveness to EPA and plaintiff requests, including coding of same (7.30); return travel from Boston (3.50) (3.5 N.C.).	10.80	1,188.00
11/30/01	LCS	Input and maintain data in the Cambridge/Winthrop Box Tracking Database.	7.50	637.50
11/30/01	WEP	Export images from Document Director and create 4 CDs (T CD0027-T CD0030) of images for coding QC	7.00	525.00

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Itemized Services

Date	Tkpr	Description	Hours	Value
Total Fees Through November 30, 2001:			697.50	\$ 87,439.00

Timekeeper Rate Summary

Initials	Name	Rank	Rate	Hours	Value
CLN	Charlotte L. Neitzel	Partner	\$ 275.00	2.80	\$ 770.00
KJC	Katheryn J. Coggon	Senior Associate	240.00	33.70	8,088.00
JAH	Jennifer A. Hall	Associate	220.00	43.70	9,614.00
BAT	Brent A. Tracy	Associate	210.00	42.00	8,820.00
TTT	Travis T. Tygart	Associate	175.00	54.70	9,572.50
TWK	Thomas W. Korver	Paralegal	110.00	52.10	5,731.00
JLS	Joan L. Sherman	Paralegal	110.00	102.80	11,308.00
JW	Johncie Wingard	Paralegal	110.00	101.00	11,110.00
NKA	Natalie K. Aberle	Paralegal	100.00	8.70	870.00
MCL	M Carla. Latuda	Paralegal	90.00	116.30	10,467.00
LCS	Loraine C. Street	Other	85.00	60.50	5,142.50
MBF	Mary Beth Floyd	Information Specialist	90.00	0.40	36.00
WEP	William E. Payne	Information Specialist	75.00	78.80	5,910.00
Total Fees:				697.50	\$ 87,439.00

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Itemized Disbursements

Date	Qty	Description	Amount
10/22/01		Travel Expense: VENDOR: Mary E. Floyd; INVOICE#: 15018; DATE: 10/22/2001 - Airfare: 11/26-12/07 Denver Boston, Boston Denver, MFloyd	\$ 30.00
10/26/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15080; DATE: 10/26/2001 - Airfare: 11-11/11/16. Denver Boston/Boston Denver. TKorver	726.00
10/26/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15093; DATE: 10/26/2001 - Airfare: 11/11-11/16. Denver Boston/Boston Denver. BTracy	726.00
10/30/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15109; DATE: 10/30/2001 - Airfare: 11/11-11/16, Denver Boston/Boston Denver. CLatuda	874.00
11/01/01	45	Photocopies	6.75
11/05/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15185; DATE: 11/5/2001 - Airfare: 11/26-30/01 Boston Denver, Denver Boston, BTracy	111.00
11/08/01		Long Distance Telephone: 6178761400	1.03
11/12/01		Long Distance Telephone: 6178761400	1.31
11/12/01		Long Distance Telephone: 6178761400	0.67
11/12/01		Long Distance Telephone: 6178761400	1.31
11/12/01		Long Distance Telephone: 6178761400	0.67
11/14/01	3	Photocopies	0.45
11/14/01	2	Photocopies	0.30
11/14/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15275; DATE: 11/14/2001 - Airfare: 12/2-12/7 Denver Boston/Boston Denver. CLatuda	726.00
11/15/01		Long Distance Telephone: 6178761400	0.05
11/15/01		Long Distance Telephone: 2128626060	1.49
11/15/01		Long Distance Telephone: 6175423025	0.82

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Itemized Disbursements

Date	Qty	Description	Amount
11/15/01		Other Meal Expenses: VENDOR: Johncie Wingard; INVOICE#: 111501; DATE: 11/15/2001 - TE: 11/4-9/01 Boston, client Document review	101.12
11/15/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-63225; DATE: 11/15/01 - Courier, Acct. 0802-0410-8 11-05; From George Thornton New York, NY to Carla Latuda Cambridge, Ma	41.74
11/15/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-63225; DATE: 11/15/01 - Courier, Acct. 0802-0410-8 11-05; From George Thornton New York, NY to Matt Murphy Boston, Ma	23.00
11/15/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-63225; DATE: 11/15/01 - Courier, Acct. 0802-0410-8 11-03; From George Thornton New York, NY to Matt Murphy Boston, Ma	30.84
11/15/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-63225; DATE: 11/15/01 - Courier, Acct. 0802-0410-8 11-07; From George Thornton New York, NY to Carla Latuda Cambridge, Ma	25.09
11/15/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-63225; DATE: 11/15/01 - Courier, Acct. 0802-0410-8 11-07; From George Thornton New York, NY to Matt Murphy Boston, Ma	46.89
11/15/01		Travel Expense: VENDOR: Johncie Wingard; INVOICE#: 111501; DATE: 11/15/2001 - TE: 11/4-9/01 Boston, client Document review	912.65
11/15/01		Travel Expense: VENDOR: Johncie Wingard; INVOICE#: 111501A; DATE: 11/15/2001 - TE: 11/26 Boston, Client	248.00
11/15/01		Travel Expense: VENDOR: Johncie Wingard; INVOICE#: 102901; DATE: 11/15/2001 - TE: 10/24 Boston, Client Airfare for 11/18 trip for document reveiw in Boston	192.00

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Itemized Disbursements

Date	Qty	Description	Amount
11/15/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15284; DATE: 11/15/2001 - Airfare: 12/9-12/14 Denver Boston/Boston Denver. NAblerle.	649.00
11/16/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15300; DATE: 11/16/2001 - Airfare: 12/02-12/07, Denver Boston/Boston Denver. RPerusso	726.00
11/19/01	2	Facsimile	2.00
11/19/01		Other Meal Expenses: VENDOR: Carla Latuda; INVOICE#: 111201; DATE: 11/19/2001 - TE: 11/4-9/01 Boston, Client Resume document reveiw at Cambridge & Winthrop Sq	241.32
11/19/01		Travel Expense: VENDOR: Johncie Wingard; INVOICE#: 111201A; DATE: 11/19/2001 - Short paid invoice TE: 11/4-9/01	19.80
11/19/01		Travel Expense: VENDOR: Carla Latuda; INVOICE#: 111201; DATE: 11/19/2001 - TE: 11/4-9/01 Boston, Client Resume document reveiw at Cambridge & Winthrop Sq	1,175.32
11/20/01		Other Meal Expenses: VENDOR: Miko Ando; INVOICE#: 111901; DATE: 11/20/2001 - TE: 11/11-16/01 Boston, Client Conduct document reveiw at Cambridge & Winthrop	171.99
11/20/01		Travel Expense: VENDOR: Miko Ando; INVOICE#: 111901; DATE: 11/20/2001 - TE: 11/11-16/01 Boston, Client Conduct document reveiw at Cambridge & Winthrop	879.73
11/22/01		Outside Courier: VENDOR: Federal Express Corporation; INVOICE#: 4-026-97928; DATE: 11/22/01 - Courier, Acct. 0802-0410-8 11-13; Anne Gard Denver, Co	9.66
11/26/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15341; DATE: 11/26/2001 - Airfare: 12/15-12/16 Denver Boston, Boston Denver. TKorver	633.00
11/26/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15342; DATE: 11/26/2001 - Airfare: 12/15-12/21 Denver Boston/Boston Denver, RPerusso	633.00
11/27/01	2	Facsimile	2.00

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Date	Qty	Description	Amount
11/27/01		Long Distance Telephone: 6178761400	0.13
11/27/01		Long Distance Telephone: 6178761400	1.03
11/29/01		Other Meal Expenses: VENDOR: Tom Korver; INVOICE#: 112701; DATE: 11/29/2001 - TE: 11/11-16/01 Boston, Client Review documents at Grace headquarters	201.50
11/29/01		Travel Expense: VENDOR: Tom Korver; INVOICE#: 112701; DATE: 11/29/2001 - TE: 11/11-16/01 Boston, Client Review documents at Grace headquarters	920.84
11/29/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15392; DATE: 11/29/2001 - Airfare: 12/16-12/21, Denver Boston/Boston Denver, CLatuda	784.00
11/29/01		Travel Expense: VENDOR: Majest International; INVOICE#: 15393; DATE: 11/29/2001 - Aifare: 1-6/1-11, Denver Boston/Boston Denver, CLatuda	649.50
11/30/01		Legal Assistant Overtime: LA overtime 11/30/2001 CL	1,718.75
11/30/01		Legal Assistant Overtime: LA overtime 11/30/2001 JS	975.00
11/30/01		Legal Assistant Overtime: LA overtime 11/30/2001 JW	907.50
Total Disbursements:			\$ 16,130.25

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Disbursement Summary

Photocopies	\$	7.50
Facsimile		4.00
Long Distance Telephone		8.51
Outside Courier		177.22
Travel Expense		11,615.84
Other Meal Expenses		715.93
Legal Assistant Overtime		3,601.25
Total Disbursements:		\$ 16,130.25

Trust Applied to Matter	\$ 0.00
Current Fees and Disbursements	\$ 103,569.25
Total Balance Due This Matter	<u>\$ 103,569.25</u>